UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF PENNSYLVANIA

| In re: |) | Chapter 7 |
|--------------------------------------|---|-----------------------|
| |) | |
| Andrew D. Ryan and Quinn Nicole Ryan |) | Doc No.: 18-24582-JAD |
| |) | |
| Debtor(s) |) | |
| |) | |

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES AND PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Montour Place, LLC, a creditor of Andrew D. Ryan and Quinn Nicole Ryan. The undersigned hereby enters his appearance pursuant to Bankruptcy Rule 9010(b), and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017, and 9007 and Section 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned counsel at the following addresses and telephone/facsimile numbers:

Weston P. Pesillo, Esquire McGrail and Associates, LLC 1714 Lincoln Way White Oak, PA 15131 Telephone: 412-664-4433

Facsimile: 412-664-4525

Emails: wpesillo@mcgrailassociates.com

PLEASE TAKE FURTHER NOTICE that, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, electronics, telephone, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a consent to jurisdiction or as a waiver of any rights (1) to have final orders in non-core matters entered only after <u>de novo</u> review by a District Judge, (2) to trial by a jury in any proceeding so triable in this case or in any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) of any rights, defenses, claims, action, setoffs, or recoupments in law or equity.

Date: October 2, 2019, 2019 /s/ Weston P. Pesillo, Esquire

Weston P. Pesillo, Esquire Pa. I.D. No.: 324595

McGrail and Associates, LLC

1714 Lincoln Way White Oak, PA 15131 Telephone: 412-664-4433 Facsimile: 412-664-4525

Email: wpesillo@mcgrailassociates.com

CERTIFICATE OF SERVICE

I, Weston P. Pesillo, Esquire, hereby certify that on this 2nd day of October 2019, I caused to be served a copy of the Notice of Appearance and Request for Notices and Papers on the following parties set forth below via first class mail, and/or electronic mail.

John C. Brzustowicz, Esq. 4160 Washington Rd. – Suite 208 McMurray, PA 15317 bmmlaw@brzmar.com

Natalie Lutz Cardiello 107 Huron Drive Carnegie, PA 15106 412-276-4043 ncardiello@comcast.net

Date: October 2, 2019 Respectfully submitted,

/s/Weston P. Pesillo, Esquire Weston P. Pesillo, Esquire